

The Honorable Marc Barreca
Chapter 13
Location: ZoomGov
Hearing Date: November 9, 2022
Hearing Time: 9:00 a.m.
Response Date: November 2, 2022

In re:	:	Case No.: 21-10964
	:	
NANCY GRACE,	:	MOTION FOR APPROVAL OF
	:	SALE OF REAL PROPERTY and NOTICE
Debtor(s).	:	OF HEARING ON MOTION

AND TO: All creditors and the Chapter 13 Trustee

Instructions

<https://www.zoomgov.com/j/1607704823?pwd=TUYxditUQ211OWdNeXVuYlZ5bTdBUT09>(link is external)

Passcode: 781136

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Meeting ID: 160 770 4823

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**Neeleman
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Group**

1 If you choose to respond to this motion, you must do so before November 2, 2022 by
2 filing a written objection with the Clerk of the Court and serving a copy of your objection on
3 debtor's counsel. If you fail to do so, the Court may enter an order granting the motion without
4 any hearing and without any further notice to you.

5
6 **MOTION**

7 COMES NOW the debtor and moves the Court for approval and authorization to sell the
8 property located at 9210 Market Place, Unit G-102, Lake Stevens, WA for \$325,000.00. The
9 debtor bases this on the following:

- 10 1. The debtor filed this Chapter 13 case on 5/17/21.
11 2. The plan was confirmed on 7/29/21.
12 3. The debtors have entered into a Purchase and Sales Agreement in order to sell the
13 home located at 9210 Market Place, Unit G-102, Lake Stevens, WA for \$325,000.
14 4. The buyers are not related to the debtor. The purchase price reflects the fair market
15 value of the property.
16 5. There is a first mortgage on the property which will be paid in full from the sales
17 proceeds.
18 6. There is a lien from FairWeather Pointe COA which will be paid from the sales
19 proceeds.
20 7. There are also agents' fees, property taxes, utility, sewer charges, excise taxes,
21 escrow fees and other closing costs associated with the sale, which will also be paid
22 from the sales proceeds.
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Motion to Approve Sale of Real Property

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1 8. From the proceeds, the debtor will also pay \$3,000.00 to pay additional attorney fees
2 as approved with any remaining balance to allowed unsecured claims to the Trustee.

3 The funds shall be sent to the Chapter 13 Trustee at the following address: Jason
4 Wilson-Aguilar, Chapter 13 Trustee, PO BOX 2139, Memphis, TN 38101-2139. The
5 form of payment shall be made payable to Jason Wilson-Aguilar, Chapter 13 Trustee,
6 and shall include the debtors' name and case number (21-10527- MLB).

7 9. Any remaining funds will be paid to the debtor. Any earnest money payments will
8 also be released to the debtor immediately.

9 10. All fees and costs associated with the sale will be paid directly from the closing agent.
10 A settlement statement is attached to this motion and reflects estimated numbers. The
11 settlement statement is subject to change.
12

13 Debtor represents that the property being sold at its fair market value and that a better
14 price or terms cannot be obtained from other purchasers, and that the sale is an arm's-length
15 transaction.

16 The debtor further moves the Court for an Order waiving the 14-day waiting period for
17 the Order to be effective.
18

19 A copy of the proposed order is attached as an Exhibit to this motion.

20 Dated this 10th day of October 2022

21 NEELEMAN LAW GROUP
22 /s/ Thomas D. Neeleman
23 Thomas D. Neeleman
24 Attorney for debtor
25
26

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